

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

COGNIZANT TRIZETTO SOFTWARE
GROUP, INC.,

Plaintiff,

v.

INFOSYS LIMITED,

Defendant.

Case No. 3:24-cv-02158-X

The Honorable Brantley Starr

INFOSYS LIMITED,

Counterclaim Plaintiff,

v.

COGNIZANT TECHNOLOGY
SOLUTIONS CORP. and COGNIZANT
TRIZETTO SOFTWARE GROUP, INC.,

Counterclaim Defendants.

**INFOSYS LIMITED’S MOTION TO COMPEL
COMPLETE AND VERIFIED RESPONSES TO INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26, 33, and 37, Defendant Infosys Limited (“Infosys”) respectfully moves the Court for an order compelling Cognizant TriZetto Software Group, Inc. (“Cognizant”) to serve (i) amended responses fully answering Interrogatory Nos. 2, 3, 4, 5, and 9 of Infosys’s First Set of Interrogatories to Cognizant TriZetto and (ii) verified responses to all of Infosys’s interrogatories.

First, Cognizant has refused to provide complete answers to Infosys’s Interrogatory Nos. 2, 3, 4, 5, and 9. These interrogatories seek straightforward information about the fundamental elements of Cognizant’s claims, such as the facts supporting Cognizant’s trade

secret misappropriation claims, identification of individuals with knowledge of those facts, and the basis for Cognizant's contention that the information at issue constitutes trade secrets. Cognizant should be compelled to provide full and complete answers that disclose the information in its possession, custody, and control, as required by Federal Rule of Civil Procedure 33.

In addition, none of Cognizant's interrogatory responses are verified. Infosys served its First Set of Interrogatories six months ago, on October 25, 2024. Despite repeated requests by Infosys, Cognizant has refused to comply with the unambiguous mandate in Rule 33 that interrogatory answers must be answered "under oath." It should be compelled to serve verified interrogatory responses as the Rules require.

Dated: April 24, 2025

Respectfully submitted,

By: /s/ Brent Caslin
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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of April, 2025, I caused the foregoing to be electronically filed with the clerk of the court for the U.S. District Court for the Northern District of Texas, by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record, a true and correct copy of the foregoing instrument and all attachments.

/s/ Brent Caslin
Brent Caslin (*pro hac vice*)